

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

AMERICAN ACCESSORIES
INTERNATIONAL, LLC,

Plaintiff,

v.

CONOPCO, INC. d/b/a UNILEVER and
UNILEVER UNITED STATES, INC.

Defendants.

(TAV)(HBG)

Case No.: 15-cv-00049

Varlan/Guyton

**DECLARATION OF GREGORY P. GULIA IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS AMENDED COMPLAINT**

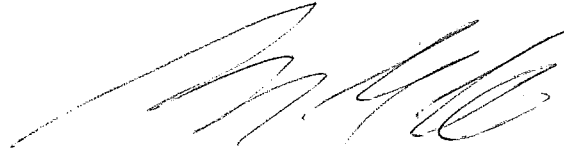
I, Gregory P. Gulia, hereby declare as follows:

1. I am a partner at the law firm of Duane Morris LLP, attorneys for defendants in the above-captioned action, Conopco, Inc. d/b/a Unilever and Unilever United States, Inc. (collectively, "Unilever").
2. I have personal knowledge of the facts stated herein and, if called upon, could competently testify thereto.
3. I respectfully submit this declaration in support of Unilever's motion to dismiss the Amended Complaint by Plaintiff American Accessories International, Inc. ("AAI") filed with this Court on March 23, 2015 (the "Amended Complaint").
4. Attached hereto as Exhibit 1 is a true and correct copy of an e-mail from Meghan Curcuruto dated March 21, 2014 announcing the 2015 Gifting Summit, describing the general

structure and timing of the Summit, and advising AAI that the 2015 Gifting Program Calendar and Q&A invitation would be forthcoming.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 9, 2015

A handwritten signature in black ink, appearing to read 'G. Gulia', is written above a horizontal line.

Gregory P. Gulia, Esq.

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EXHIBIT 1

From: Curcuruto, Meghan <Meghan.Curcuruto@unilever.com>
Sent: Friday, March 21, 2014 2:11 PM
To: Hyman Wolfson; Mindy Floyd; Kadi Burkhalter; Katie Cancellare; Jennifer Marty
Cc: Romero, Karishma; Labree-Giardino, Jean
Subject: 2015 Gifting Summit (AA)

Dear AA Team,

The 2015 Gifting Program Calendar will be sent to you via YouSendIt. This spreadsheet contains programs for the entire year, across all brands (see each tab). Please reference only the sections highlighted in yellow for premium structures (bags, baskets, etc.) and premium hard goods.

The Gifting Summit will be both a presentation and working session to review the following:

- Evaluation of trends today and how they will evolve in 2015
 - Trends include fabrics, textures, patterns, and commonly gifted items that people are buying today
- Presentation of premium structures and hard goods
 - Feature collections through patterns and fabrics by brand for each season (i.e. Dove Mother's Day and Holiday collections)
 - Provide samples of premium structures in a variety of silhouettes for different customers
 - Include fabric swatches of various color/pattern combinations
 - Only provide samples of high quality material that fall **within the suggested cost** outlined per item
- Samples
 - Two sets of each chosen sample should be expected to arrive in the NJ office the following the Gifting Summit
 - Once program is finalized, 60 samples will be required for comps (~6-8 weeks from time chosen)

Timing/Gifting Summit:

- Q&A Conference Call session to occur week of March 31st to review any questions on the brief
- Gifting summit meetings will be set up during the week of June 26th (full day) and June 27th (morning)
 - One full day dedicated to trends and reviewing live samples/fabric options
 - Second morning dedicated to key actions/next steps
- Key milestones for decisions following the summit

We are looking forward to meeting with you; please be on the lookout for the Q&A invite over the next several days.

Thanks,
Meghan